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UNIVERSITY OF PHOENIX

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, ex rel.
MARY HENDOW and JULIE
ALBERTSON,

Plaintiff,

v.

UNIVERSITY OF PHOENIX,
Defendant.

CASE NO. CV-03-0457 GEB DAD

**STIPULATION AND ORDER EXTENDING
THE TIME FOR DEFENDANT
UNIVERSITY OF PHOENIX TO
RESPOND TO RELATORS' SECOND
REQUESTS FOR PRODUCTION OF
DOCUMENTS**

Judge: Magistrate Judge Dale A. Drozd
Place: Courtroom 27

Pursuant to Local Rule 6-144(a), Defendant University of Phoenix ("UOP") and Relators Mary Hendow and Julie Albertson ("Relators"), hereby submit this Stipulation and [Proposed] Order Extending the Time for Defendant University of Phoenix to Respond to Relators' Second Requests for Production of Documents.

RECITALS

WHEREAS, Relators served their Second Requests for Production of Documents on UOP by U.S. mail on November 9, 2007.

WHEREAS, UOP's responses to Relators' Second Requests for Production of Documents are currently due on December 12, 2007.

WHEREAS, UOP requires additional time to respond to Relators' Second Requests for Production of Documents, whether by response, objection, moving for a protective order, or any other means, especially in light of the fact that the parties are attempting to come to an agreeable solution with respect to certain aspects of discovery.

WHEREAS, Local Rule 6-144(a) states that "an initial stipulation extending time for no more than thirty (30) days . . . to respond to . . . requests for production of documents may be filed without approval of the Court"

WHEREAS, UOP believes that this provision of Local Rule 6-144(a) also applies to an agreement by the parties to extend the time within which a party may move for a protective order in response to a request for production of documents, but has included a [proposed] order herewith in an abundance of caution.

THE PARTIES HEREBY STIPULATE AND AGREE AS FOLLOWS:

1. The deadline for UOP to respond to Relators' Second Requests for Production of Documents by whatever means, including, but not limited to, through responses, through objections, or by moving for a protective order, shall be extended to January 11, 2008.

DATED: December 11, 2007

LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP
ROBERT J. NELSON

By: /s/ Robert J. Nelson (as authorized on December 11, 2007)
Robert J. Nelson

Attorney for Relators,
MARY HENDOW & JULIE ALBERTSON

DATED: December 11, 2007

GIBSON, DUNN & CRUTCHER LLP
JAMES L. ZELENAY, JR.

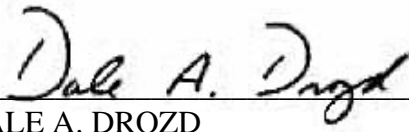
By: /s/ James L. Zelenay, Jr.
James L. Zelenay, Jr.

Attorney for Defendant,
UNIVERSITY OF PHOENIX

ORDER

Pursuant to the above Stipulation, **IT IS ORDERED** that the deadline for Defendant University of Phoenix to respond to Relators' Second Requests for Production of Documents by whatever means, including, but not limited to, through responses, through objections, or by moving for a protective order, shall be extended to January 11, 2008.

DATED: December 12, 2007.



DALE A. DROZD
UNITED STATES MAGISTRATE JUDGE

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